

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1 and JANE DOE #2 on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

MG FREESITES, LTD, d/b/a  
“PORNHUB”; MG FREESITES II,  
LTD; MINDGEEK S.A.R.L.;  
MINDGEEK USA INCORPORATED;  
MG CY HOLDINGS LTD;  
MINDGEEK CONTENT RT LIMITED;  
9219-1568 QUEBEC, INC., d/b/a  
MINDGEEK); MG BILLING LTD

Defendants.

CIVIL ACTION NO. 7:21-CV-00220

**DEFENDANTS’ CORPORATE DISCLOSURE STATEMENT**

This Corporate Disclosure Statement is filed on behalf of Defendants MindGeek S.A.R.L., MindGeek USA Incorporated, MG Freesites Ltd, MG Freesites II Ltd, MG Billing Ltd, and 9219-1568 Quebec Inc., in compliance with the provisions of Federal Rule of Civil Procedure 7.1 and Local Civil 3.4. Since Defendants are not aware of the existence of an affiliated entity named MindGeek Content RT Ltd but are aware of an affiliated entity named MG Content RT Ltd, Defendants make the required disclosure for MG Content RT Ltd here as well.

1. MindGeek S.A.R.L. hereby declares that it is the ultimate parent corporation of Defendants MindGeek USA Incorporated, MG Freesites Ltd, MG Content

RT Ltd, 9219-1568 Quebec Inc. and MG Billing Ltd. There is no publicly held corporation that owns 10% or more of MindGeek S.A.R.L.'s stock.

2. MindGeek USA Incorporated hereby declares that its ultimate parent corporation is MindGeek S.A.R.L. There is no publicly held corporation that owns 10% or more of MindGeek USA Inc.'s stock.
3. MG Freesites Ltd hereby declares that its ultimate parent corporation is MindGeek S.A.R.L. There is no publicly held corporation that owns 10% or more of the stock of MG Freesites Ltd.
4. MindGeek S.A.R.L. declares that it was previously the ultimate parent corporation of MG Freesites II Ltd; and further declares that as of December 10, 2020, the entire business and ownership of MG Freesites II Ltd was transferred to MG Freesites Ltd, and MG Freesites II Ltd was dissolved. No publicly held corporation owned 10% or more of the stock of MG Freesites II Ltd.
5. MG Content RT Ltd hereby declares that its ultimate parent corporation is MindGeek S.A.R.L. There is no publicly held corporation that owns 10% or more of the stock of MG Content RT Ltd.
6. MG Billing Ltd hereby declares that hereby declares that its ultimate parent corporation is MindGeek S.A.R.L. There is no publicly held corporation that owns 10% or more of the stock of MG Billing Ltd.

7. 9219-1568 Quebec Inc. hereby declares that its ultimate parent corporation is MindGeek S.A.R.L. There is no publicly held corporation that owns 10% or more of the stock of 9219-1568 Quebec Inc.

Pursuant to Local Rule 3.4, Defendants certify that there are no parents, subsidiaries and/or affiliates of said Defendants (and MG Content RT Ltd) that have issued shares or debt securities to the public. These representations are made to enable the Court to evaluate possible disqualification or recusal. Defendants reserve their rights to supplement this certification subject to the discovery of any applicable additional information as the case proceeds. A supplemental disclosure statement will be filed upon any change in the information provided herein.

Respectfully submitted this 2<sup>nd</sup> of July, 2021.

/s/ Sara M. Turner  
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**CERTIFICATE OF SERVICE**

I hereby certify on this 2nd day of July, 2021, this document was filed through the Electronic Case Filing System of the United States District Court for the Northern District of Alabama and will be served electronically by the court to all participants of record.

/s/ Sara M. Turner  
*Sara M. Turner*